

EXHIBIT C



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July 24, 2009

Via Certified Mail & Facsimile (228) 863-2886

Cy T. Faneca
Dukes, Dukes, Keating & Faneca
2909 13th Street, 6th Floor
Gulfport, MS 39502

Re: *Seal v. Harrison County, MS, et al*; Cause No. 1:08-cv-0175-LG-RHW

Dear Cy:

On or about May 4, 2009, Plaintiff propounded interrogatories and requests for production of documents to your client, Defendant, Harrison County Sheriff, George Payne, in his official capacity, in the referenced matter. Plaintiff received responses to the interrogatories and requests for production of documents on or about June 18, 2009. However, the responses to some of the interrogatories and requests for documents are incomplete.

Below is a list of each interrogatory, and the reason why your clients' response is incomplete:

INTERROGATORY NO. 8: Describe any and all photographs, video tapes or film of the Plaintiff and/or subject matter of the present litigation.

The response does not indicate anything regarding the video tape involved in this incident. In response to Interrogatory No. 10(F.), your client responded that video was reviewed of the incident in investigating this claim; however, no video has been produced. There are videos for other incidents that occurred in the booking area and holding cells in 2005 and 2006. Please produce any and all video footage of the booking area and holding cells from September 4, 2005.

INTERROGATORY NO. 18: State whether or not you received a copy of the 1995 Federal Court Order to improve conditions and guaranty inmate rights at the Harrison County Detention Facility. If so, state the date you received the Order and all actions you have taken to implement the Federal Court Order.

Cy T. Faneca
July 24, 2009
Page 2

In response to this interrogatory, your client stated that he received a copy of the 1995 Consent Decree when he took office; however, your client failed to respond to the part of the interrogatory requesting "all actions you have taken to implement the Federal Court Order." Please respond to this part of the interrogatory.

Furthermore, as mentioned above, your client's response to the following request for production was insufficient, and below is the request for production, and the reason why your client's response is in need of supplementation:

REQUEST NO. 6: Produce copies of any and all photographs, film, videotapes, drawings, newspaper articles, or diagrams which Defendants have or which may be in the hands of their attorney, which in any way relate to this claim.

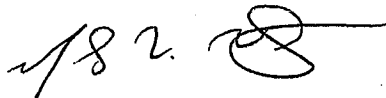
Your response to the request states that your office is in possession of over 30 boxes of videos, and you further point us to your answer to Request No. 2. As discussed *supra*, the video footage of the subject exists because it was apparently reviewed by officers in their investigation of this incident. Please produce any and all video footage of the booking area and holding cells from September 4, 2005.

This letter represents Plaintiff's good faith attempt to resolve this discovery dispute. Please provide the requested information and videos by Friday, July 31, 2009. Otherwise, we will have to pursue a motion to compel. We appreciate your cooperation.

Should you have any questions, please feel free to contact me.

Sincerely,

BROWN BUCHANAN, P.A.

A handwritten signature in black ink, appearing to read "182" followed by a stylized flourish or "B".

MARK V. WATTS

MVW/snd

cc: All Counsel of Record